

Jonathan M. Baum (SBN: 303469)
Steptoe LLP
One Market Street
Steuart Tower, Suite 1070
San Francisco, CA 94105
Telephone: (510) 735-4558
jbaum@steptoe.com

Reid H. Weingarten
Brian M. Heberlig
Michelle L. Levin
Nicholas P. Silverman
Drew C. Harris
(Admitted Pro Hac Vice)

Steptoe LLP
1114 Avenue of the Americas
New York, NY 10036
Telephone: (212) 506-3900

Christopher J. Morvillo
Celeste L.M. Koeleveld
Daniel S. Silver
(Admitted Pro Hac Vice)
Clifford Chance US LLP
31 West 52nd Street
New York, NY 10019
Telephone: (212) 878-3437
christopher.morvillo@cliffordchance.com

*Attorneys for Defendant
Michael Richard Lynch*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

MICHAEL RICHARD LYNCH and
STEPHEN KEITH CHAMBERLAIN,

Defendants.

Case No.: 3:18-cr-00577-CRB

Judge: Hon. Charles Breyer

**DECLARATION OF CELESTE L.M.
KOELEVELD IN SUPPORT OF
DEFENDANT MICHAEL RICHARD
LYNCH'S OPPOSITION TO THE
GOVERNMENT'S MOTION TO ADMIT
OTHERWISE PRECLUDED EVIDENCE**

Court: Courtroom 6 – 17th Floor
Date Filed: April 29, 2024
Trial Date: March 18, 2024

DECLARATION OF CELESTE L.M. KOELEVELD

I, Celeste L.M. Koeleveld, declare as follows:

1. I am an attorney licensed to practice law in New York and a partner at the law firm of Clifford Chance US LLP, counsel for the defendant Michael Richard Lynch.

2. I have knowledge of the facts set forth herein, and if called upon as a witness to testify thereto, I could do so competently under oath.

3. Attached hereto as Exhibit 1 is a true and accurate copy of Trial Exhibit 20053.03, a memorandum of a meeting between Joel Scott and Morgan Lewis Bockius, dated January 17, 2013.

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed April 29, 2024, in San Francisco, California.

/s/ Celeste L.M. Koeleveld
Celeste L.M. Koeleveld